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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 10, 2004

Mr. Keith A. Klein, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. Joel Hebdon, Director
Regulatory Compliance and Analysis Division
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

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JUN 14 2004
EDMC

Dear Messrs. Klein and Hebdon:

Re: Transmittal of the Hanford Facility Dangerous Waste Part A Permit Application,
Form 3, for the Hexone Storage and Treatment Facility (04-OES-0049)

Regulatory Integration for 276-S-141 and 276-S-142 "Hexone" Tanks with the
200-IS-1 Operable Unit

I am recommending that the Washington State Department of Ecology (Ecology) approve the Part A Dangerous Waste Permit Application for the Hexone Storage and Treatment Facility, Revision 5. Ecology will transmit a separate letter notifying the United States Department of Energy (USDOE) whether the application has been approved or denied; the letter will also notify USDOE that the proposed change is a Class 1 change. Revision 5 added 14 dangerous waste codes to the Part A application as a result of characterization sampling and analysis for the 276-S-141 and 276-S-142 tanks (hexone tanks).

Ecology expects to add the hexone tanks to the Hanford Site-wide Permit within the next 12 months. The permit chapter for the hexone tanks will include a reference to General Condition II.H.1, "Cost Estimates for Facility Closure." Ecology expects to include a unit-specific condition requiring the submittal of an updated cost estimate for the hexone tanks. Ecology made a previous request to USDOE (letter dated August 29, 2003, from John B. Price, Ecology, to Bryan Foley, USDOE) to include in the 200-IS-1 Remedial Investigation/Feasibility Study (RI/FS) work plan the "processing of multiple tanks as a likely response scenario."

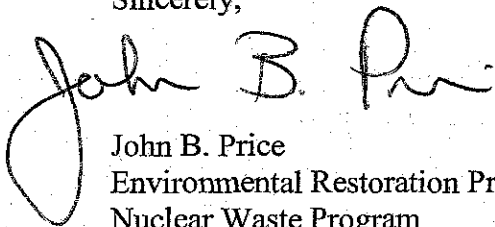
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That earlier request is relevant to USDOE's projection of anticipated costs for closure and post-closure of the hexone tanks. USDOE should ensure that cost estimates for closure of the hexone tanks take advantage for economies of scale related to the processing of multiple tanks. USDOE referred to those economies of scale in its letter 02-WMD-044, "Stabilization Options for the Hexone Tanks."

Closure of the hexone tanks is being planned in accordance with the Hanford Federal Facility Agreement and Compliance Order provisions for Resource Conservation and Recovery Act-Comprehensive Environmental Response, Compensation and Liability Act (RCRA-CERCLA) integration. Revision 5 of the Part A Permit Application states that "The tanks will be closed in conjunction with the 200-IS-1 operable unit." The task-level schedule given by USDOE to Ecology indicates RI/FS work plan for the 200-IS-1 operable unit will be transmitted to Ecology in October 2004. Ecology expects that the revised RI/FS work plan shall likewise recognize the potential cost savings related to processing multiple tanks in an integrated manner.

USDOE and contractor staffs are encouraged to discuss proposed changes with Ecology's unit managers to clarify any questions and/or concerns. If you have any questions, please contact me at (509) 372-7921 or Jean Vanni at (509) 372-7930.

Sincerely,



John B. Price
Environmental Restoration Project Manager
Nuclear Waste Program

JP:JV:lkd

cc: Craig Cameron, EPA
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Environmental Portal
Administrative Record: 200-IS-1, 276-S-141/142
Hexone Tanks